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PENINSULA PERIODONTAL ASSOCIATES, STEPHEN R. PICKERING DDS, MSD,
BRYAN I. POPE, DMD, MSD, BRENDA LAMB LEWIS, DDS, MSD, ERIKA BARRIOS

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

GABRIELLE GREENBAUM,
Plaintiff,

vs.

PENINSULA PERIODONTAL
ASSOCIATES, STEPHEN R. PICKERING
DDS, MSD, BRYAN I. POPE, DMD, MSD,
BRENDA LAMB LEWIS, DDS, MSD,
ERIKA BARRIOS. and DOES 1-20,
inclusive,

Defendants.

CASE NO.

NOTICE OF REMOVAL

TO THE CLERK OF THE ABOVE-ENTITLED COURT:

PLEASE TAKE NOTICE that Defendants PENINSULA PERIODONTAL
ASSOCIATES, STEPHEN R. PICKERING, DDS, MSD, BRYAN I. POPE, DMD, MSD,
BRENDA LAMB LEWIS, DDS, MSD, and ERIKA BARRIOS (collectively referred to as
“Defendants”) do hereby remove to this Court the state court action described below:

1. On January 6, 2022, an action was filed in the Superior Court of the State of

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California, County of San Mateo, entitled *Gabrielle Greenbaum v Peninsula Periodontal Associates, et al.*, Case No. 22-CIV-00062. A true and correct copy of said action is attached hereto as **Exhibit A**.

2. The Proofs of Service of the Summons indicates that the Summons and Complaint in this matter was served personally on defendant ERIKA BARRIOS on January 18, 2022. The remaining named defendants in this action PENINSULA PERIODONTAL ASSOCIATES, STEPHEN R. PICKERING, DDS, MSD, BRYAN I. POPE, DMD, MSD, BRENDA LAMB LEWIS, DDS, MSD, were all served by substitute service on January 18, 2022. True and correct copies of the Proofs of Service are attached hereto as **Exhibit B**.

3. This case is removable under 28 U.S.C. §1441(a) because this is a civil action in which the District Courts of the United States have been given original jurisdiction under 28 U.S.C. §1331. Specifically, the plaintiff's complaint includes causes of action under the Fair Labor Standards Act (29 U.S. Code § 201, et seq.) for which federal jurisdiction is found. See 29 U.S. Code § 216; *Breuer v. Jim's Concrete of Brevard, Inc.*, 538 U.S. 691 (2003). Pursuant to 28 U.S.C. §1441(a).

4. This removal petition is made by all the named defendants, each of whom consents to this Notice of Removal. *Proctor v. Vishay Intertechnology Inc.*, 584 F.3d 1208, 1225 (9th Cir. 2009).

DATED: February 15, 2022

FARBSTEIN & BLACKMAN
A Professional Corporation

By: /s/ H. Ann Liroff
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MSD, and ERIKA BARRIOS

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